

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PHYLLIS CARSON; LORNE	)	
COSMAN; WILLIAM DRAPER;	)	
PHILLIP ERICKSON; TERENCE	)	
GRANER; DONALD HARMAN;	)	C.A. No. 22-208-CFC
SARAH HOUSEHOLDER; TRUDY L.	)	
GRANER; TRUDY LETSON; SABINE	)	
MILLER; DIANA HOBERT-POWELL;	)	
JANET PURVIS; PATRICIA	)	
ROBERTS; CAROLE SCHAUER;	)	
CARA WASHINGTON; STEPHEN	)	
KAPLITT; MICHAEL DOBKIN;	)	
CHERYL MEOLA; DIANE DRAKE;	)	
CHRISTOPHER NIND; ROSE	)	
CARINA; BRUCE WILLIAMS;	)	
ANTHONY HARRIS; TIMUR	)	
SAKHARUK; ROBERT DIMARTINO;	)	
IAN PERRY; STEPHEN LUTHER;	)	
GREGORY ORENSKI; RODNEY	)	
NASH; and DEBORAH THELEN	)	
individually and on behalf of all others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
HP INC.,	)	
	)	
Defendant.	)	

**JOINT STIPULATION AND [PROPOSED] ORDER**

WHEREAS, on May 23, 2022, Plaintiffs Phyllis Carson; Lorne Cosman; William Draper; Phillip Erickson; Terence Graner; Donald Harman; Sarah Householder; Trudy L. Graner; Trudy Letson; Sabine Miller; Diana Hobert-Powell;

Jan Purvis; Patricia Roberts; Carole Schauer; Cara Washington; Stephen Kaplitt; Michael Dobkin; Cheryl Meola; Diane Drake; Christopher Nind; Rose Carina; Bruce Williams; Anthony Harris; Timur Sakharuk; Robert DiMartino; Ian Perry; Stephen Luther; Gregory Orenski; Rodney Nash; and Deborah Thelen individually and on behalf of all others similarly situated (collectively, “Plaintiffs”) filed a 154-page, 557-paragraph First Amended Class Action Complaint (the “Complaint”) against HP Inc. (“HP” or “Defendant”);

WHEREAS, on June 23, 2022, HP filed a Motion to Dismiss and Opening Brief (D.I. 14) under an extended word count previously approved by the Court (D.I. 12);

WHEREAS, in lieu of an Answering Brief, Plaintiffs filed a Second Amended Complaint on July 28, 2022 (D.I. 19);

WHEREAS, the Second Amended Complaint spans 253 pages and 968 paragraphs and requires the application of the law of numerous different states;

WHEREAS, under this Court’s standing order of November 6, 2019, “[f]or each page allowed by local rule, the parties shall use up to 250 words;”

WHEREAS, the parties recognize that this Court’s preference is for parties to comply with the Court’s briefing schedule and word limitations described above;

WHEREAS, the parties have conferred and agreed, subject to approval by the Court, that based on the complexity of the issues raised in the Second Amended

Complaint and their experience briefing complex issues in other matters, an enlargement of time and page limits is appropriate with respect to briefing related to the forthcoming motion to dismiss;

WHEREAS, the parties respectfully submit that the briefing schedule and page limits set forth below will allow the parties to prepare the most helpful briefs so as to allow the efficient consideration by this Court of these significant and complex issues.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, subject to the approval of the Court, as follows:

1. To the extent HP moves to dismiss or to strike the Complaint:
  - (a) HP shall file a single opening brief in support of its motions on or before September 1, 2022;
  - (b) HP's Opening Brief that shall not exceed **8,000 words** (exclusive of the cover page, table of contents, table of authorities, and signature block),
  - (b) Plaintiffs shall file any answering brief within **35 days** of HP's filing of its opening brief,
  - (c) Any such answering brief shall not exceed **8,000 words** (exclusive of the cover page, table of contents, table of authorities, and signature block),
  - (d) HP shall file a reply brief in support of its motions within **21 days** of the answering brief,

(e) Any such reply brief shall not exceed **4,000 words** (exclusive of the cover page, table of contents, table of authorities, and signature block).

/s/ P. Bradford deLeeuw

P. Bradford deLeeuw (#3569)  
deLeeuw Law LLC  
1301 Walnut Green Road  
Wilmington, DE 19807  
(302) 274-2180  
brad@deleewlaw.com

*Attorney for Plaintiffs*

/s/ Kelly E. Farnan

Kelly E. Farnan (#4395)  
Richards, Layton & Finger, P.A.  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
(302) 651-7700  
farnan@rlf.com

*Attorney for Defendant HP Inc.*

Dated: August 5, 2022

SO ORDERED this \_\_\_ day of \_\_\_\_\_ 2022.

\_\_\_\_\_  
Chief United States District Judge